

Achieve Financial
CREDIT UNION

April 3, 2009

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: Advanced Notice of Proposed Rulemaking to 12 CFR Part 704

Dear Ms. Rupp:

On behalf of Achieve Financial Credit Union, I would like to take this opportunity to comment on the recently issued Advance Notice of Proposed Rulemaking (ANPR) to 12 CFR Part 704.

Achieve Financial Credit Union is \$100 million in assets, has 15,251 members, and serves SEGs in the education and healthcare industries. The ANPR requests comment on many areas of detail which this letter does not intend to address point by point. Instead, I wish to convey support for changes to the overall corporate network itself that will position it to better serve the credit union movement into the future. Some of the points raised in the ANPR would then be mute, others to be determined at a later date.

Achieve Financial depends greatly on its local corporate, Constitution Corporate FCU, and values the services it provides. We also value the people who work there and appreciate their dedication to serving its natural person credit union members as well as the movement on the whole. This letter should not be construed as being dissatisfied in any way with our Corporate, its governance, the products/services offered, or the people who work there. Times have changed and an opportunity exists for the NCUA to work closely with the credit union industry to steer a new course for the future.

Whenever I talk with someone unfamiliar about credit unions, I start by saying a credit union is like a local community bank. I do so as a starting point because there is no better point of reference that people can comprehend and it makes it easier to then contrast the differences. Similarly, when I have to explain to a new volunteer or someone outside of the credit union what a corporate is, I start by drawing parallels to the Federal Reserve and its regional banks. I believe the most important section of NCUA's ANPR is the first, dealing with the role of the corporate network itself. My response is more to convey a vision of what I believe the future of the corporate network should entail. I do recognize there are legal barriers, as well as resistance to such radical change from both the corporate realm and those that they serve.

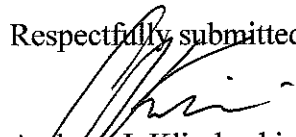
That being said, I would hope the NCUA board would consider the following key points:

Together We Can.

- ✓ The corporate system should be the primary source for natural person credit unions to manage liquidity through the availability of various savings (investment) and loan products/services.
- ✓ The payment systems should not be separated from the entity providing the liquidity solutions.
- ✓ The whole corporate network should be consolidated into a single entity that has several regional branches, much like the Federal Reserve's regional banks. Corporates do not need to compete against one another for deposits and/or transaction services. The industry would be better served to have a single strong viable competitor to the FHLBs and FiServes out there. Efficiencies and cost savings would be passed onto natural person credit unions the credit union way- better savings rates, lower borrowing costs and/or lower fees.
- ✓ NCUA should create a clearly defined vision for the future of the corporate network and then work with CUNA, the corporate network and natural person credit unions to communicate and educate all interested parties.
- ✓ The present two-tier corporate system should be dismantled with the support and assistance of corporate and natural person credit unions, not through exercise of any regulatory powers by the NCUA.
- ✓ Industry support would improve if the net result of such consolidation were to show a reduction in the costs associated with the NCUA's stabilization plan through the use of present reserves and undivided earnings within the network. The NCUA board could then devise a multi-year plan to use the earnings from ongoing operations at the new single entity to rebuild its capital, as well as seek industry input on substitute means for direct contributions from natural person credit unions.

I thank you for taking the time to read this letter and consider the viewpoints contained within.

Respectfully submitted,



Andrew J. Klimkoski
President/CEO

Cc: Robert Nealon, President/CEO, Constitution Corporate FCU
Tony Emerson, President, Credit Union League of CT